

# EXHIBIT C

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**From:** Zina Bash <zina.bash@kellerpostman.com>  
**Sent:** Wednesday, August 16, 2023 3:28 PM  
**To:** J Edward Bell; Neil Williams; Elizabeth Cabraser; Robin Greenwald; Mona Lisa Wallace; jar@lewis-roberts.com; Michael Dowling; Kim Abernethy; Eric Flynn  
**Cc:** Roy Willey; Paul Doolittle; Blake Abbott; CMAD  
**Subject:** RE: Plaintiff's Correspondence Case No.: 7:23-cv-00897-RJ In Re: Camp Lejeune Water Litigation  
**Attachments:** Re: CLJ Intro - Paul Doolittle

Roy, Paul, and Blake, thanks for your e-mail, but it's simply not true to say that you "have been unable to schedule a time to speak with [us] all." I made time to speak with Paul within 24 hours of his asking for a call (see attached)—just as I have spoken to every lawyer expressing an interest in serving in this litigation. As you can imagine, there have been dozens. But we take seriously our responsibility as appointed Leadership and welcome the opportunity to hear from others who might be able to serve the plaintiffs in this case. (I assume you don't mean to complain that each of you has not had an opportunity to speak to each of us. We are a team and share information among us. I'd be somewhat alarmed if the seven of us would have had conversations with each of you, as 14 conversations to convey what I'm able to convey in a single conversation to the group would be wasteful. And we have no time to waste here.)

During our call, Paul expressed his interest in serving on a subcommittee. And I told him the same thing I'd previously told the Court in applying for Leadership: At this juncture, we believe that the Leadership group we assembled already comprises the best mix of talent and experience to successfully lead—and resolve—this litigation, and the group will work together most effectively, efficiently, and agreeably, to the benefit of all Camp Lejeune claimants.

That said, just as we did while assembling the Leadership group, we are always examining whether there are gaps to fill. Our goal is to offer these most deserving of plaintiffs the absolute best representation. And if we ever need your help—or that of the dozens of other lawyers who have reached out to express an interest in assisting us—we'll be in touch. But it is simply not possible to have every lawyer who has reached out serve on Leadership—it would be wasteful and inefficient.

As a Leadership group, we continue to devote ourselves to this litigation, to the plaintiffs, and to the Court. We believe that a Motion for Reconsideration would not be a fruitful use of time, but we'll conjure up some extra time and resources to oppose any such motion in support of the Court's entirely proper Order.

If you'd like to speak further, I'm happy to talk (again).

**Zina Bash**  
Partner

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**From:** J Edward Bell <jeb@belllegalgroup.com>  
**Sent:** Wednesday, August 16, 2023 11:18 AM  
**To:** Neil Williams <neil.williams@poulinwilley.com>; Elizabeth Cabraser <ecabraser@lchb.com>; Robin Greenwald <rgreenwald@weitzlux.com>; Zina Bash <zina.bash@kellerpostman.com>; Mona Lisa Wallace <mwallace@wallacegraham.com>; jar@lewis-roberts.com; Michael Dowling <mike@dowlingfirm.com>; Kim Abernethy <kabernethy@belllegalgroup.com>; Eric Flynn <EFlynn@belllegalgroup.com>  
**Cc:** Roy Willey <roy@poulinwilley.com>; Paul Doolittle <pauld@akimlawfirm.com>; Blake Abbott <blake@akimlawfirm.com>; CMAD <cmad@akimlawfirm.com>  
**Subject:** Re: Plaintiff's Correspondence Case No.: 7:23-cv-00897-RJ In Re: Camp Lejeune Water Litigation

Roy and Paul

I am not aware of anyone attempting to reach me to discuss Camp Lejeune. Of course we are available to discuss all of these matters at any convenient time.

Unfortunately, next week I will be out of the office but the following week would work well for me. Please coordinate with Kim Abernethy at my office a convenient time to meet. I think an inperson meeting would be most productive.

I look forward to meeting with you and discussing CL, a subject that is important to me.

Thanks

Ed Bell

Please let Kim Abernethy know with whom should she work with to arrange this meeting.



**Ed Bell**

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**From:** Neil Williams <[neil.williams@poulinwilley.com](mailto:neil.williams@poulinwilley.com)>

**Date:** Tuesday, August 15, 2023 at 4:29 PM

**To:** J Edward Bell <[jeb@bellegalgroup.com](mailto:jeb@bellegalgroup.com)>, Elizabeth Cabraser <[ecabraser@lchb.com](mailto:ecabraser@lchb.com)>, Robin Greenwald <[rgreenwald@weitzlux.com](mailto:rgreenwald@weitzlux.com)>, Zina Bash <[zina.bash@kellerpostman.com](mailto:zina.bash@kellerpostman.com)>, Mona Lisa Wallace <[mwallace@wallacegraham.com](mailto:mwallace@wallacegraham.com)>, [jar@lewis-roberts.com](mailto:jar@lewis-roberts.com) <[jar@lewis-roberts.com](mailto:jar@lewis-roberts.com)>, Michael Dowling <[mike@dowlingfirm.com](mailto:mike@dowlingfirm.com)>

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**Subject:** Plaintiff's Correspondence Case No.: 7:23-cv-00897-RJ In Re: Camp Lejeune Water Litigation

You don't often get email from [neil.williams@poulinwilley.com](mailto:neil.williams@poulinwilley.com). [Learn why this is important](#)

Counselors,

Please see the attached correspondence in the above captioned matter dated August 15, 2023.

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